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10 Attorneys for Defendants
11 PLAINS ALL AMERICAN PIPELINE, L.P.
and PLAINS PIPELINE, L.P.

12 UNITED STATES DISTRICT COURT

13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

14
15 GREY FOX, LLC a California limited
liability company,

16 Plaintiff,

17 vs.

18 PLAINS ALL AMERICAN PIPELINE,
19 L.P., a Delaware limited partnership,
20 PLAINS PIPELINE L.P., a Texas
limited partnership,

21 Defendants.

Case No. 2:16-cv-03157-PSG-JEM

**PLAINS' PROPOSED VOIR DIRE
QUESTIONS**

Judge: Hon. Philip S. Gutierrez

Trial Date: July 11, 2024

Final Pretrial Conference: June 28, 2024

1 Pursuant to the Court's Order for Jury Trial (Dkt. 231), Defendants Plains All
2 American Pipeline, L.P. and Plains Pipeline L.P., hereby provide the following
3 proposed voir dire questions for the jury trial in this action:

4 1. Do you have strong feelings, positive or negative, about large
5 corporations? If yes, please describe.

6 2. What are your general opinions about companies in the oil industry?

7 3. Do you know anyone who has ever been affected by the spill of oil or
8 any potentially hazardous material? If yes, please describe who and how they were
9 affected.

10 4. Have you and/or a close family member or friend ever lived near an oil
11 pipeline? If yes, please describe.

12 5. Have you heard of Plains All American Pipeline or Plains Pipeline? If
13 yes, what have you heard? And what opinion, if any, do you have about the
14 company?

15 6. Are you familiar with an oil spill that occurred in Santa Barbara County
16 in May 2015? If yes, what have you heard?

17 7. Have you heard, read, or seen anything about any legal proceedings or
18 lawsuits relating to the May 2015 oil spill in Santa Barbara County?

19 8. Do you and/or a close family member or friend own any real property
20 in Santa Barbara County? If yes, please describe the property and its location.

21 9. Have you and/or a close family member or friend ever owned real
22 property that required remediation or repair as a result of someone else causing
23 damage to that property? If yes, please describe.

24 10. Do you and/or a close family member or friend have any experience or
25 training in environmental remediation? If yes, please describe.

26 11. Do you and/or a close family member or friend have any education or
27 training in environmental engineering? If yes, please describe.

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1 12. Do you have experience drafting, reviewing, or otherwise dealing with
2 contracts in your current job or previous employment history? If yes, please
3 describe.

4 13. Have you and/or a close family member or friend ever been a party to a
5 lawsuit (i.e., sued someone or been sued by someone)? If yes, please describe the
6 type of case and circumstances.

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8 DATED: June 21, 2024

MUNGER, TOLLES & OLSON LLP

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11 By: /s/ Jordan D. Segall
12 JORDAN D. SEGALL
13 Attorneys for Defendants
14 PLAINS ALL AMERICAN PIPELINE,
15 L.P. and PLAINS PIPELINE, L.P.
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